

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MICHIGAN

JACK LIPTON,

Plaintiff,

Case No. 24-1029

v.

Hon. Hala Y. Jarbou

DENNIS DENNO, in his individual  
capacity, and REMA VASSAR, in her  
individual and official capacities,

Defendants.

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**DEFENDANT DENNIS DENNO’S CERTIFICATE REGARDING MOTION  
CONCURRENCE FOR DEFENDANT DENNIS DENNO’S UNOPPOSED MOTION TO  
STAY PROCEEDINGS PENDING APPEAL**

Pursuant to Local Rule 7.1(d), Defendant Dennis Denno (“Mr. Denno”), by and through his respective attorneys, Starr, Butler, & Stoner, PLLC, made the following efforts to obtain Plaintiff’s concurrence prior to filing his Motion to Stay Proceedings Pending Appeal (ECF No. 84)

On Tuesday, June 10, 2025, the undersigned counsel initially sought concurrence in the requested relief from Plaintiff’s counsel, Coriann Gastol, via phone at approximately 1:30 PM. During the call, the undersigned counsel explained the basis for this motion. Thereafter, the undersigned counsel engaged in several follow-up phone calls with Plaintiff’s attorneys and similarly exchanged numerous emails. Most recently, the undersigned counsel communicated with Liz Abdnour, lead counsel for Plaintiff, via phone on Monday, June 23, 2025 and via email on June 24, 2025. On June 24-25, 2025, Plaintiff’s counsel provided written confirmation that she does not oppose the stay, so long as the Court retains jurisdiction to address and enforce two subpoenas seeking documents and information from an entity and person who are not parties to

this lawsuit. As detailed in Mr. Denno's brief, Mr. Denno and Dr. Vassar accepted these conditions. Thus, Plaintiff does not oppose Mr. Denno's motion.

Respectfully submitted,

STARR, BUTLER, & STONER, PLLC

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Dated: June 27, 2025

**CERTIFICATE OF SERVICE**

The undersigned says that on June 27, 2025, she has caused to be served a copy of **Defendant Dennis Denno's Certificate Regarding Motion Concurrence and this Certificate of Service** via the Court's electronic filing system upon all attorneys of record.

s/ Kiersten Plane